

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

GERTRUDE WILLIX, RAMESH SHAH, and  
VIKAS BHAT, individually and on behalf all  
others similarly situated,

Plaintiffs,

v.

HEALTHFIRST, INC., d/b/a HEALTHFIRST;  
HF MANAGEMENT SERVICES, LLC, d/b/a  
HEALTHFIRST; and HEALTHFIRST PHSP,  
INC. d/b/a HEALTHFIRST

Defendants.

No. 07 Civ. 1143 (RER)

**NOTICE OF MOTION FOR FINAL APPROVAL OF THE CLASS ACTION  
SETTLEMENT AND APPROVAL OF THE FLSA SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of the Class Action Settlement and Approval of the FLSA Settlement ("Motion for Final Approval") and in the Declaration of Justin M. Swartz in Support of Plaintiffs' Motion for Final Approval ("Swartz Decl."), Plaintiffs respectfully request that the Court enter an Order:

- (1) granting final approval of the Joint Settlement and Release ("Settlement Agreement"), attached as Exhibit A to the Swartz Decl.;
- (2) granting approval of the FLSA settlement; and
- (3) granting such other, further, or different relief as the court deems just and proper.

Plaintiffs submit a Proposed Order, attached hereto as **Exhibit A**, for the Court's convenience.

Dated: February 8, 2011  
New York, New York

Respectfully submitted,  
**OUTTEN & GOLDEN LLP**

/s/ Justin M. Swartz

Justin M. Swartz

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